

CALLAHAN & BLAINE, APLC

David J. Darnell (SBN 210166)

ddarnell@callahan-law.com

Gaurav K. Reddy (SBN 259496)

greddy@callahan-law.com

3 Hutton Centre Drive, Ninth Floor

Santa Ana, California 92707

Telephone: (714) 241-4444

Facsimile: (714) 241-4445

Attorneys for Plaintiffs Ross Cornell and
Bryan Estrada

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

Ross Cornell, an individual, and Bryan
Estrada, an individual;

Plaintiffs,

v.

Office of the District Attorney, County
of Riverside, and Does 1-100,
inclusive;

Defendants.

Case No. 5:22-cv-00789 JWH (SHKx)

[Assigned to Hon. John W. Holcomb]

**NOTICE OF MOTION FOR
PRELIMINARY INJUNCTION**

*[Memorandum of Points and
Authorities, Declarations of Ross
Cornell, Bryan Estrada, and Adelfo
Cerame, Jr., (Proposed) Order, and
Proof of Service filed concurrently
herewith]*

Date: June 24, 2022

Time: 9:00 a.m.

Courtroom: 9D

Action Filed: May 9, 2022

Trial Date: None set

CALLAHAN & BLAINE

A PROFESSIONAL LAW CORPORATION
3 HUTTON CENTRE DRIVE, NINTH FLOOR
SANTA ANA, CALIFORNIA 92707
TELEPHONE: (714) 241-4444
WWW.CALLAHAN-LAW.COM

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**TO DEFENDANT OFFICE OF THE DISTRICT ATTORNEY,
 COUNTY OF RIVERSIDE AND ITS ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE THAT at 9:00 a.m. on June 24, 2022, or as soon thereafter as counsel may be heard, in the courtroom of the Honorable John W. Holcomb located at 411 W. 4th Street, Santa Ana, California 92701-4516, Courtroom 9D, 9th Floor, Plaintiffs Ross Cornell and Bryan Estrada (together, “Plaintiffs”) will move for an order for a preliminary injunction pursuant to Fed. R. Civ. P. 65 against Defendant Office of the District Attorney, County of Riverside (“Defendant” or the “RCDA”), its officers, agents, servants, employees, and attorneys, and all those in active concert or participation with it or them, which injunction shall specify the following:

- The RCDA shall stay the prosecution of Plaintiffs (Riverside County Superior Court Case No. RIF2201190 (the “Prosecution”));
- The RCDA shall dismiss the Prosecution with prejudice;
- The RCDA shall retract its press release concerning Plaintiffs;
- The RCDA shall be restrained and enjoined from interfering with Plaintiffs’ pending lawsuits under the Americans with Disabilities Act; and
- The RCDA shall be restrained and enjoined from using the fruits of its investigation in further acts of retaliation or interference against Plaintiffs.

This motion will be made on the ground that immediate and irreparable injury will result to Plaintiffs unless the activities described above are enjoined pending trial of this action.

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1 This motion will be based on this Notice of Motion and Motion, the
2 concurrently filed Memorandum of Points and Authorities, and the concurrently
3 filed Declarations of Ross Cornell, Bryan Estrada, and Adelfo Cerame, Jr.

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5 Dated: May 27, 2022

CALLAHAN & BLAINE, APLC

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7 By: /s/ Gaurav K. Reddy
8 Gaurav K. Reddy
9 Attorneys for Plaintiffs Ross Cornell and
10 Bryan Estrada
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